

Exhibit H

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

DEMOCRACY NORTH CAROLINA;)	
NORTH CAROLINA BLACK)	
ALLIANCE; LEAGUE OF WOMEN)	
VOTERS OF NORTH CAROLINA,)	
)	
Plaintiffs,)	
)	
vs.)	Civil Action No.
)	
ALAN HIRSCH, in his)	1:23CV00878-TDS-JEP
official capacity as CHAIR)	
OF THE STATE BOARD OF)	
ELECTIONS; JEFF CAMERON)	
III, in his official)	
capacity as SECRETARY OF)	
THE STATE BOARD OF)	
ELECTIONS; STACY EGGERS IV,)	
in his official capacity as)	
MEMBER OF THE STATE BOARD)	
OF ELECTIONS; KEVIN LEWIS,)	
in his official capacity as)	
MEMBER OF THE STATE BOARD)	
OF ELECTIONS; SIOBHAN)	
O'DUFFY MILLEN, in her)	
official capacity as MEMBER)	
OF THE STATE BOARD OF)	
ELECTIONS; KAREN BRINSON)	
BELL, in her official)	
capacity as EXECUTIVE)	
DIRECTOR OF THE STATE BOARD)	
OF ELECTIONS; NORTH)	
CAROLINA STATE BOARD OF)	
ELECTIONS,)	
)	
Defendants.)	

DEPOSITION OF DAISUKE TIM TSUJII

9:03 A.M.

WEDNESDAY, MARCH 12, 2025

A P P E A R A N C E S

Counsel for the Plaintiffs:

Steptoe

BY: Laurel Taylor

Michael Dockterman

(Attended remotely)

Jamie Witte

(Attended remotely)

227 West Monroe Street, Suite 4700

Chicago, Illinois 60606

(312) 577-1300

lataylor@steptoe.com

mdockterman@steptoe.com

jwitt@steptoe.com

-and-

Southern Coalition for Social Justice

BY: Jeffrey Loperfido

Lily Talerman

(Appeared remotely)

Helena Abbott

(Appeared remotely)

5517 Durham-Chapel Hill Boulevard

Durham, North Carolina 27707

(919) 794-4213

jeffloperfido@scsj.org

lily@scsj.org

helena@scsj.org

Counsel for the Deponent Daisuke Tim Tsujii:

Forsyth County Attorney's Office

BY: Erica Glass

201 North Chestnut Street

Winston-Salem, North Carolina 27101

(336) 703-2030

glasses@forsyth.cc

Counsel for the Defendant-Intervenors:

Nelson Mullins Riley & Scarborough

BY: Cassie A. Holt

301 Hillsborough Street, Suite 1400

Raleigh, North Carolina 27603

(919) 329-3800

cassie.holt@nelsonmullins.com

A P P E A R A N C E S (Continued)

Counsel for the Defendant North Carolina State
Board of Elections:

North Carolina Department of Justice
BY: Michael Bulleri
114 West Edenton Street
Raleigh, North Carolina 27603
(919) 716-6400
mbulleri@ncdoj.gov

Also Present: Kay Moore

Stenographically
Reported By:

Discovery Court Reporters and
Legal Videographers
BY: Lisa A. Wheeler, RPR, CRR
4208 Six Forks Road, Suite 1000
Raleigh, North Carolina 27609
(919) 649-9998

--oOo--

1 the -- to the process.

2 Q. Have you had to quickly adapt to other
3 changes in the election landscape in the
4 past?

5 A. Yes. Yeah. On different occasions.

6 Q. How did adjusting to S.B. 747 compare?

7 A. Similar to those, yeah.

8 Q. Did any -- did you or any of your board
9 members express any concerns about S.B. 747
10 to the State Board?

11 A. No.

12 Q. Okay. We're going to talk a little bit about
13 processing same-day registrations now.

14 A. Okay.

15 Q. We'll walk through that process --

16 A. Okay.

17 Q. -- okay, and then if anything is better for
18 Ms. Moore to answer, we can do that.

19 Starting from the beginning, a voter
20 comes to an early voting site and asks to
21 same-day register.

22 A. Yes.

23 Q. What happens then?

24 A. So the first thing they'll -- the poll
25 workers will ask generally is to -- inform

1 and -- and ask the voter if they have the
2 necessary identification that is required for
3 completing same-day registration. And so the
4 ID has to include the voter's name and
5 current Forsyth County address. It's
6 essentially the list of HAVA IDs and -- which
7 could be utility bill, bank statement. In
8 cases of college students that live on
9 campus, here in Forsyth County, again, it's a
10 best practice that we maintain as provided by
11 the State Board where we reach out to our
12 local universities to request for -- their
13 student roster of their on-campus housing
14 students and that spreadsheet will include
15 the student's name, their dorm address, and
16 their mailing address. And so if in the
17 event a student appears that lives on campus,
18 they can essentially show their student ID
19 and we would verify their housing information
20 off of that list or if they don't appear on
21 that list for whatever reason, or if they
22 choose to where they arrive with the student
23 ID and a housing letter that verifies that I,
24 voter, live at such and such dorm on campus,
25 that is sufficient. For any other voter,

1 again, it could -- it could be utility be- --
2 bill, bank statement, and/or
3 government-issued ID that has those two key
4 pieces of information. They'll then -- if
5 they do have the ID, they'll then proceed to
6 complete their voter registration information
7 in SOSA.

8 Now, just to backtrack, if in the event
9 the voter does not have the ID, the poll
10 worker will indicate to the voter that they
11 have the option to go and retrieve that
12 required ID and come back and we -- we shared
13 this in training where if -- in situations
14 like that that we encourage or let the -- let
15 the voters know that, you know, if you go
16 home and get that ID and you come back, we'll
17 make sure -- we'll put you right in front of
18 the line, so that's sort of out of common
19 courtesy.

20 The other option is -- that is presented
21 to the voter if they don't have the ID is to
22 vote a provisional ballot and then they can
23 appear at the Board of Elections up to the
24 day before canvass to present that necessary
25 ID in order for their provision to count.

1 But going back to the process where if
2 the voter has the necessary ID, they'll then
3 enter in the information on the screen in
4 SOSA, the -- the poll book system. Again,
5 as -- we do our best in training to remind
6 all the workers to try to complete every
7 and -- ev- -- every and any information on
8 the screen as best as possible, including the
9 phone number. And -- and, again, we -- we
10 remind the workers that the phone number is
11 pertinent because if in the event there's any
12 discrepancies or issues with their voter
13 registration, this will allow the -- the
14 Board of Elections office to reach out to the
15 voter and cure any of those deficiencies.

16 After entering in the required -- any --
17 any and all the information on the screen,
18 they then proceed to print the voter's voter
19 registration application and their early
20 voting application that -- we ask the voter
21 to sign both pieces of document. We are a
22 ballot-on-demand county so subsequent to
23 clicking vote on the screen, it will then
24 print their specific ballot and the voter can
25 proceed to cast their ballot and feed it

1 through the tabulator.

2 Do you want me to keep going?

3 Q. We can break some of that down --

4 A. Okay.

5 Q. -- a little bit.

6 A. Okay.

7 Q. So you mentioned you obtain student lists
8 from universities.

9 A. Yes.

10 Q. Did the State Board advise you to obtain
11 those lists?

12 A. I believe it's mentioned in the numbered
13 memo, but it's not -- it's not a requirement
14 or a mandate. But this was a practice that
15 we've been doing ourselves for -- for many
16 years prior to 7- -- even prior to 747.

17 Q. Do you know if other counties also obtain
18 lists?

19 A. So during my time in Guilford County, we did
20 the same thing.

21 Q. Talking about ballots on demand, are other
22 counties also ballot-on-demand counties or is
23 Forsyth unique?

24 A. There are several other counties with ballot
25 on demand during early voting.

1 same-day registration applications just like
2 how I outlined.

3 Q. You said you were a connected county.
4 What -- what does that mean?

5 A. So being a connected county means that the
6 laptops out at the early voting sites are --
7 are networked through remote desktop and
8 it -- it transfers data every 30 minutes from
9 each individual laptop back to our server
10 or -- yeah, our -- our main hub here at the
11 Board of Elections.

12 Q. Okay. So once you transfer the information,
13 is the information -- it's then checked at
14 that point and verified?

15 A. Could you elaborate on that --

16 Q. Yeah.

17 A. -- on what you mean by --

18 Q. Does anything in --

19 A. -- checked and verified?

20 Q. -- particular get checked with addresses or
21 are they entered exactly as written on the
22 registrant's application? Are you
23 checking --

24 A. Right. So there are occasions where -- and I
25 had mentioned previously that there are

1 occasions where addresses may be partial or
2 incomplete or incorrect even. Our geocode
3 file does have certain addresses that are
4 specific to our county GIS files. So
5 while -- and it -- it does differ with the
6 Postal Service's mail- -- mailing addresses
7 or address files that they utilize. And
8 so -- or even the DMV. The address that
9 the -- the affected voter might provide to
10 the DMV might be different than the address
11 that we have on our geocode file. And in
12 order for it to be properly processed and to
13 sync up with our voter registration database,
14 we will make that modification. But SOSA is
15 already -- already has that geocode file to
16 where -- and it has -- what is it called --
17 the auto- -- if you start to type the first
18 couple of letters, it -- it produces a
19 dropdown with possible addresses that
20 matches. And so it -- it's -- it's very rare
21 that an address will be submitted if it
22 doesn't already match our -- our county GIS
23 geocode file, but there are situations where
24 there can be differences in the address
25 information where we need to modify.

1 Sometimes we do get situations --
2 perfect example with students that live on
3 campus where they are -- for -- for our
4 geocode file, they are to provide their dorm
5 name as their street name, but they'll
6 instead provide -- for example, Winston-Salem
7 State students, they might provide 301 North
8 Martin Luther King Jr. Drive because that's
9 the university's primary address and so if we
10 see that, we would correct that. So those --
11 those are just two examples that I can think
12 all -- think of off the top of my head. But,
13 yeah, we -- we can -- and -- and there are
14 occasions where if -- if need be and if a
15 phone number is provided, we will reach out
16 to the voter to verify that address
17 information if need be.

18 Q. Okay. During the address verification
19 process, what status does the ballot and
20 registration get at that time?

21 A. So at that time, I mean, the ballot has been
22 tabulated through the scanner, but it hasn't
23 been -- I mean, all early voting ballots
24 are -- are reserved -- I -- I use that
25 term -- until election day because they can't

1 A. We have Winston-Salem State University, Wake
2 Forest University, UNC School of the Arts,
3 and Salem College. Those are the -- the
4 primary residential -- colleges that maintain
5 on-campus residences. We also have Forsyth
6 Tech, which is the -- the community college
7 here. There are other universities such as
8 Carolina University. I believe that's all
9 the schools but --

10 Q. Did you notice issues with undeliverable mail
11 at colleges, at campuses?

12 A. I do not know.

13 Q. Are there any military bases in Forsyth
14 County?

15 A. No, there are not.

16 Q. Did you notice any bounce-back rates that are
17 higher for senior or assisted living homes?

18 A. I do not know.

19 Q. Homeless shelters?

20 A. I don't know.

21 Q. Did you observe any difficulties for sort of
22 these unconventional types of residents,
23 colleges, senior homes with mail
24 verification?

25 A. So as -- as mentioned before -- and thanks to

1 having been provided with the college
2 rosters, we were able to use that as a tool
3 to remedy any discrepancies of on-campus
4 residences. So the -- I -- I know that Kay
5 did not have to speak to any of the
6 universities or communicate with the
7 universities to verify on any individual
8 on-campus students at --

9 Q. All of the universities created lists that
10 you requested?

11 A. They -- they created it and provided it to
12 us. We just tell them what we need.

13 Q. Do you have a sense of whether same-day
14 registration is common among college
15 students?

16 A. I do not know. That's not data that we
17 track.

18 Q. Did you request template examples for
19 addresses from colleges?

20 A. So we provide -- we supply the universities
21 and we make it public on our websites and so
22 it's kind of an effort on our end to share
23 with the universities and -- and for them to
24 disseminate to their students and to -- to
25 communicate to their students that this --